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July 28, 2003

**DELIVERED ELECTRONICALLY**

Nicholas Linden  
Assistant Administrator  
Telecommunications Division  
Public Service Commission of Wisconsin  
610 North Whitney Way  
PO Box 7854  
Madison, WI 53707-7854

RE: *Issues - Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin 6720-TI-183*

Submitted by: TSI Telecommunication Services, Inc.

Contact: David J. Robinson  
Telephone: 813-273-3307  
e-mail: drobinson@tsiconnections.com

Name:

SBC inability to produce "billing detail" or "source data" associated with signaling.

**Brief Description:**

In Wisconsin, Carriers have a choice to build their own SS7 network, acquire SS7 network services from a third-party provider (like TSI), or purchase signaling services from SBC. Building an SS7 network requires a substantial commitment of capital, and those carriers who either do not have the capital resources available or who choose to commit those capital resources to other investment opportunities are left with the choice of purchasing signaling services from a third-party provider or directly from SBC. Third-party signaling providers carry no voice traffic and have no independent use for signaling messages, except to support the telephone calls of their carrier customers. TSI is a competitive alternative to SBC for signaling services. TSI owns its SS7 network; however, we depend on SBC to offer signaling services.

TSI signaling services supports local calls exchanged with SBC's network by our CLEC and CMRS customers. SBC denies it has a responsibility to provide billing detail to facilitate TSI's and other third-party signaling providers' ability to audit the signaling messages exchanged with SBC to determine accurate signaling message counts and proper jurisdictional billing treatment associated with the calls supported by SS7 services. Again, TSI has requested billing detail regarding signaling charges; SBC insists that the tariff does not include any requirement to produce billing detail for audit purposes.

Without reliable billing or source data it is impossible for TSI to audit and verify the accuracy of SBC's charges.

Please answer the following questions:

Q1. When this issue was first discovered?

A. September 2002

Q2. How many occurrences and approximately over how long a period of time?

A. Monthly

Q3. Is it a recurring problem?

A. Yes.

Q4. Your belief as to the cause of the problem.

A. Inability of SBC billing system and SS7 monitoring devices to create an auditable source for billing purposes that verifies the measurement or count of ISUP messages or TCAP messages associated with signaling services.

Q5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

A. Yes. SBC is misapplying the access service catalog to increase our costs to provide a similar service.

Q6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? When this issue was first discovered?

A. High – these charges continue to be assessed each month.

Q7. Any other pertinent information?

A. No.

If TSI can provide any additional information, please contact me at 813-273-3307.

Very truly yours,

David J. Robinson  
TSI Telecommunication Services Inc.